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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

NOTICE OF FILING OF PROPOSED ORDER GRANTING LATE CLAIM MOTIONS

PLEASE TAKE NOTICE that, between November 30, 2020, and March 5, 2021, motions to file proofs of claim after the extended general bar date in these chapter 11 cases (the “**Extended General Bar Date**”) were filed by several individuals at docket numbers 2057 (Kyle Parks), 2069 (Arlandis C. Issac), 2071 (Andre S. Youngblood), 2086 (Shane Christian Peterson), 2088 (Neil W. King), 2193 (Troy A. Pesina), 2211 (Lisa M. Acquaviva), and 2458 (Brian Lee Danner) (collectively, the “**Late Claim Motions**”) seeking leave to have Personal Injury Claimant

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Proof of Claim Forms and/or General Opioid Claimant Proof of Claim Forms (the “**Late Claims**”) deemed timely filed notwithstanding that the Late Claims were filed after the Extended General Bar Date.

PLEASE TAKE FURTHER NOTICE that, on April 14, 2021, the Debtors filed the *Notice of Adjournment of Hearing Regarding Motions to File Proofs of Claim After Extended General Bar Date Filed at Docket Numbers 2057, 2069, 2071, 2086, and 2088* [Dkt. No. 2639], the *Notice of Adjournment of Hearing Regarding Motions to File Proofs of Claim After Extended General Bar Date Filed at Docket Numbers 2193 and 2211* [Dkt. No. 2640], and the *Notice of Adjournment of Hearing Regarding Motions to File Proofs of Claim After Extended General Bar Date Filed at Docket Number 2458* [Dkt. No. 2641], adjourning the hearing on the Late Claim Motions to May 20, 2021.

PLEASE TAKE FURTHER NOTICE that in light of the *Second Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Dkt. No. 2823] and the PI Trust Distribution Procedures appended thereto [Dkt. No. 2732], which provide a mechanism for compensating personal injury claims filed before April 23, 2021, the Debtors do not object to the relief sought in the Late Claim Motions. The Official Committee of Unsecured Creditors and the Ad Hoc Group of Individual Victims also consent to the relief sought in the Late Claim Motions.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file a proposed Order Granting Late Claim Motions (the “**Proposed Order**”). Pursuant to the Proposed Order, the Late Claims will be treated as timely filed, and the Debtors will not object to the Late Claims based on their not having been filed by the Extended General Bar Date. The Proposed Order is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that a copy of the Proposed Order and all related papers may be obtained free of charge by visiting the website of Prime Clerk LLC at

<https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: May 14, 2021
New York, New York

Respectfully submitted,

/s/ James I. McClammy

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